



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P. O. Box 3378  
Honolulu, HI 96801-3378

September 23, 2015

Mr. Ernest Lau, P.E.  
Manager and Chief Engineer  
Board of Water Supply  
City and County of Honolulu  
630 South Beretania Street  
Honolulu, HI 96813

Dear Mr. Lau:

SUBJECT: Response to August 17, 2015 Letter re: Red Hill Bulk Fuel Storage Facility

Thank you for your letter dated August 17, 2015 and your continued interest in the Hawaii Department of Health and the U.S. Environmental Protection Agency's ("the Regulatory Agencies") approach to regulating the Navy's Red Hill fuel storage facility ("the Facility").

In your letter, you request a determination from EPA's Office of General Counsel on how the newly promulgated federal regulation changes would apply to the Red Hill underground tanks once these changes become applicable in Hawaii.

We forwarded your request on to the Office of Underground Storage Tanks, and they provided a response via e-mail indicating concurrence from the Office of General Counsel. To summarize, the new federal requirements would not trigger cathodic protection changes to the tanks at the Facility (see attached).


Additionally, your letter states that the proposed AOC does not address the risk to drinking water supplies. We disagree. Although the Regulatory Agencies continue to consider public comments and potential changes to the agreement, the AOC comprehensively addresses the risks posed by the Facility by providing an enforceable vehicle to develop and implement a technically sound approach for assessing releases, establishing technically sound cleanup objectives, and carrying out appropriate corrective actions. The majority of the guidance you referenced can be utilized during the scoping process outlined in the AOC.

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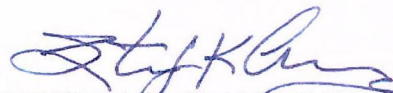
Thank you again for your interest in our regulation of the Red Hill facility. We look forward to continuing to work with you as an important stakeholder in our efforts to ensure that the Facility is operated in an environmentally protective manner that safeguards Honolulu's vital drinking water resources.

Should you have any questions, feel free to contact Steven Linder of the U.S. Environmental Protection Agency at (415) 972-3369 or Steven Chang of the Hawaii Department of Health at (808) 586-4226.

Sincerely,



STEVEN LINDER, MANAGER  
Underground Storage Tank Program  
U.S. Environmental Protection Agency, Region 9



STEVEN Y.K. CHANG, P.E., CHIEF  
Solid and Hazardous Waste Branch  
Hawaii Department of Health

Attachment

## Linder, Steven

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**From:** Gerber, Linda  
**Sent:** Thursday, September 10, 2015 9:43 AM  
**To:** Linder, Steven  
**Cc:** Barolo, Mark; Miller, Paul  
**Subject:** Response to Honolulu Board of Water Supply about concrete tanks lined with steel

Steve,

You asked us to respond the Honolulu's Board of Water Supply's question about applicable corrosion protection requirements associated with concrete tanks lined with steel. This answer has been reviewed by Headquarters Office of General Counsel. They concur with the answer.

Please let me know if you would like to discuss further.

Thanks,

Linda

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Please keep in mind that Hawaii has state program approval so their approved state UST requirements operate in lieu of the federal requirements. So whatever the requirements are in Hawaii's approved state program, those are the requirements, and not the federal requirements, these USTs must follow. Nevertheless, we believe that a discussion of the federal UST requirements for corrosion protection could still be helpful, so we provide that discussion below.

The Board of Water Supply argues that corrosion protection requirements apply to concrete tanks with a steel interior lining, even if they do not apply to steel tanks encased in concrete. However, neither situation would require cathodic protection because the corrosion protection requirement in the federal UST regulation for concrete tanks with a steel interior lining is intended to protect the tank from external corrosion, and not internal corrosion, as further explained below.

If we assume the tanks are concrete tanks with a steel interior lining as the Board of Water Supply asserts, then the Board is correct that, under the federal UST regulation, the corrosion protection requirement would apply to these underground storage tanks. However, a concrete tank with a steel internal lining already meets EPA's corrosion protection requirement for underground storage tanks components that are in contact with the ground, and would not need to add cathodic protection. This is because it is the concrete, not the steel, which is in contact with the ground. As a result, the steel internal lining would not need to be cathodically protected because it is not in contact with the ground. In addition, the UST regulation does not have a requirement to protect a tank from internal corrosion.

Once again, we note that it is Hawaii's approved state UST program that applies to these USTs, so those Hawaii UST regulations, rather than the federal UST regulations, would be the applicable requirements.